

CORRES. CONTROL  
OUTGOING LTR NO.

AK corr 46818

DOE ORDER# 5400.1

94 RF 11571

## EG&G ROCKY FLATS

DIST. LTR INC

AMARAL, M.E.

BURLINGAME, A.H. X

BUSBY, W.S.

BRANCH, O.B.

CARNIVAL, G.J.

DAVIS, J.G.

FERRERA, D.W.

FRAY, R.E.

GEIS, J.A.

GLOVER, W.S.

GOLAN, P.M.

HANNI, B.J.

HARMAN, L.K.

HEALY, T.J.

HEDDAHL, T.

HILBIG, J.G.

HUTCHINS, N.M.

JACKSON, D.T.

KELL, R.E.

KUESTER, A.W.

MARX, G.E.

MCDONALD, M.M.

MCKENNA, F.G.

MONTROSE, J.K.

MORGAN, R.V.

POTTER, G.L.

PIZZUTO, V.M.

RISING, T.L.

SANDLIN, N.B.

SCHWARTZ, J.K.

SETLOCK, G.H.

STEWART, D.L.

STIGER, S.G. X

Broussard, M.C. X

Burnmaster, M.C. X

Criffin, J.R. X

Greenleaf, L.A. X

Johnson, G.D. X

Johnson, L. X

Kilbourne, L. X

Leithner, R.M. X

Peter, K.G. X

Schmiedchen, A.R. X

CORRES. CONTROL X X

ADMIN RECORD/0802 X

RAFFIC

PATS/T130G X

EG&G ROCKY FLATS, INC.

ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

November 18, 1994

94-RF-11571

Jessie M. Roberson  
Assistant Manager for  
Environmental Restoration  
DOE, RFFO

Attn: B. I. Williamson

NOTIFICATION TO RETAIN INTERIM STATUS FOR RCRA UNIT 18.01 (10835) – SGS-601-94

Action: None required

The purpose of this letter is to: (1) inform the Department of Energy of EG&G's intent to retain Interim Status for Resource Conservation and Recovery Act (RCRA) Unit 18.01, and (2) document the established acceptance criteria for the Decontamination Pads as requested in the referenced letter.

The Main Decontamination Facility (Unit 18.01) presently has interim status. By retaining interim status for Unit 18.01, anticipated future Environmental Restoration Program Division (ERPD) activities, including Decontamination and Decommissioning (D&D) will be supported. Unit 18.01 is the only facility of its kind with interim status and deregulation of this unit may prevent Rocky Flats Environmental Technology Site from performing current and future D&D and ERPD activities.

Prior to accepting any equipment, materials, or facilities (hereafter "equipment") for decontamination or accepting any waste for accumulation and storage, the equipment and the waste are evaluated against the acceptance criteria defined for the unit. An evaluation is also conducted to determine the disposition of the wastes which will be generated from the proposed decontamination or waste accumulation activities. Additionally, in accordance with EMD Operating Procedure FO.4 (5-21000-OPS-FO.4), all gross contamination is scraped off in the field prior to the equipment being brought to the Decontamination Facility.

Presently Unit 18.01 is utilized for environmental activities performing RCRA Facility Investigation/Remedial Investigation (RFI/RI), Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) investigations, and Remedial Action fieldwork for operable units (OUs) on plantsite. Examples of these activities include decontamination of drill rigs, auger bits, drums, trucks, front end loaders and the accumulation of field decontamination rinsates and purgewater from groundwater monitoring wells. The advantages to retaining interim status are described below:

### CLASSIFICATION:

UCNI

UNCLASSIFIED

CONFIDENTIAL

SECRET

AUTHORIZED CLASSIFIER

SIGNATURE

DOCUMENT CLASSIFICATION

REVIEW WAIVER PER

CLASSIFICATION OFFICE

DATE

IN REPLY TO REF. CO. NO.

3883-RF-94

ACTION ITEM STATUS

PARTIAL OPEN

OR CLOSED

APPROVALS:

WVW

ORIG. & TYPIST INITIALS

MBW/arc

A-0002-001056

- Ability to perform centralized decontamination of equipment contaminated with visible hazardous waste and hazardous debris;
- Ability to decontaminate empty and non-empty containers (e.g. tanker trucks);
- Closure not required at this time; and
- If closed and future needs are identified, the process to obtain permit modifications may be lengthy.

Treatment will not be conducted at the Decontamination Facilities as defined in the Colorado Hazardous Waste Regulations (6 CCR 1007-3 Section 261.7).

"Treatment means any method, technique, or process, including neutralization, designed to change the physical, chemical, or biological, character or composition of any hazardous waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage, or reduced in volume."

In accordance with the existing interim status conditions for Unit 18.01, only the following waste codes are presently accepted, generated or stored. A request will be submitted for any additional waste codes which may be encountered and are not already stated in Part A.

D004	Arsenic	D019	Carbon Tetrachloride
D005	Barium	D022	Chloroform
D006	Cadmium	F001	Spent Halogenated Solvents used in degreasing
D007	Chromium	F002	Spent Halogenated
D008	Lead	F003	Spent Non-halogenated Solvents
D009	Mercury	F005	Spent Non-halogenated Solvents
D011	Silver		

Listed below are waste and equipment that are presently accepted and anticipated in the future at the Decontamination Facilities and the options for dispositioning the waste generated. The decontamination facility wash water can be dispositioned at the following units: OU1 Treatment Unit located in Building 891, OU2 Field Treatability Unit (FTU), Building 374 Liquid Waste Treatment Operations, Sewage Treatment Plant (STP). The acceptance criteria for each of these facilities has been previously established. The unit to which each batch of decontamination facility wash water will be dispositioned is determined on a batch-by-batch basis, based on the types of equipment decontaminated, the types of wastes accumulated, and the concentrations of specific analytes in the wastes generated.

**OU1 Treatment Facility (accepts only "contained-in" wastes and characteristic RCRA-regulated hazardous wastes)**

- Decontamination wash water from environmental operations that meets the OU1 acceptance criteria; and
- Purge water from groundwater wells; and
- Tanker trucks & empty containers that meet the definition of RCRA empty (6 CCR 1007-3 Section 261.7).

**OU2 Field Treatability Unit (FTU) (accepts only "contained-in" wastes and characteristic RCRA-regulated hazardous wastes)**

- Decontamination wash water from environmental operations that meets the OU2 acceptance criteria; and
- Tanker trucks & empty containers that meet the definition of RCRA empty; and
- Purge water from groundwater wells.

**Building 374 Liquid Waste Treatment Operations (accepts "contained-in", mixture rule and derived-from wastes)**

- Decontamination wash water from environmental operations that meets the Building 374 waste acceptance criteria; and
- Tanker truck & empty Containers that meet the definition of RCRA empty;
- Sludge Sucker and equipment for OU4 operations;
- Decanted water from OU2 drums; and
- Rinsate from RCRA closures.

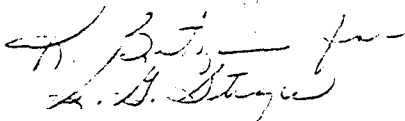
**Sewage Treatment Plant (STP) (accepts "contained-in", mixture rule and derived-from wastes)**

- Decontamination wash water from environmental operations that meets the STP acceptance criteria; and
- Equipment that is a hazardous waste (e.g. decontamination not meeting the definition of treatment);
- Purge water from groundwater monitoring wells;
- Decanted water from OU2 drums;
- Sludge Sucker and equipment from OU4 operations; and
- Tanker trucks & empty containers that meet the definition of RCRA empty.

J. M. Roberson  
November 18, 1994  
94-RF-11571  
Page 4

**RCRA Unit 18.01 does not accept excess chemicals or empty containers from "P" listed waste. (accepts only "contained-in", mixture rule and derived-from wastes.)**

If necessary, the Protected Area Decontamination Facility (PADF) will also be permitted in the future, and if the need is identified, both decontamination facilities will be permitted for treatment as well as storage. If you have any further questions on RCRA Unit 18.01 please contact Annette Schmiechen of my staff at extension 3191.



S. G. Stiger, Director  
Environmental Restoration Program Division  
EG&G Rocky Flats, Inc.

MBU:alc

Orig. and 1 cc - J. M. Roberson

cc:

F. Gerdeman	-	DOE, RFFO
S. R. Grace	-	" "
F. R. Lockhart	-	" "
D. Maxwell	-	" "
J. J. Rampe	-	" "
M.N. Silverman	-	" "
B. McCarthy	-	SAIC
J. Stewart	-	SAIC